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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

|                           |   |                                |
|---------------------------|---|--------------------------------|
| UNITED STATES OF AMERICA, | ) | No. CR 06-00189 SBA            |
|                           | ) |                                |
| Plaintiff,                | ) | STIPULATION TO CONTINUE        |
|                           | ) | HEARING FOR CHANGE OF PLEA AND |
| v.                        | ) | SENTENCING; ORDER EXCLUDING    |
|                           | ) | TIME                           |
| TANYA WALTON,             | ) |                                |
|                           | ) |                                |
| Defendant.                | ) |                                |

Plaintiff, by and through its attorney of record, and defendant, by and through his attorney of record, hereby stipulate and ask the Court to find as follows:

1. The government and defendant have reached a negotiated disposition in which defendant would plead guilty to an information pursuant to a binding plea agreement.

2. Previously, the parties submitted the proposed plea agreement for the Court's consideration pursuant to Federal Rule of Criminal Procedure 11(c)(1)(C). The Court previously set a hearing for change of plea and imposition of judgment and sentence for 10:00 a.m. on March 18, 2008, and found that the time period from January 29, 2008, through March 18, 2008, was excludable under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(1)(I) because that period of delay resulted from consideration by the Court of a proposed plea agreement entered

1 into by the defendant and the government pursuant to Federal Rule of Criminal Procedure  
 2 11(c)(1)(C).

3 3. The parties request that the date for the hearing for change of plea and imposition  
 4 of judgment and sentencing be continued from March 18, 2008, to April 15, 2008, in order to  
 5 allow defendant Walton additional time for the parties to analyze her safety valve proffer which  
 6 is part of, and will therefore impact, the plea agreement currently under consideration by this  
 7 Court. Accordingly, the parties also request that the Court find that the time period from March  
 8 18, 2008, to April 15, 2008, is excludable under the Speedy Trial Act pursuant to 18 U.S.C.  
 9 § 3161(h)(1)(I) because that period of delay results from consideration by the Court of a  
 10 proposed plea agreement entered into by the defendant and the government pursuant to Federal  
 11 Rule of Criminal Procedure 11(c)(1)(C).

12 IT IS SO STIPULATED.

13 DATE: March 13, 2008

Respectfully submitted,

JOSEPH P. RUSSONIELLO  
 United States Attorney

/s/<sup>1</sup>

GARTH HIRE  
 Assistant United States Attorney

Attorneys for Plaintiff  
 UNITED STATES OF AMERICA

19 DATE: March 13, 2008

/s/

V. ROY LEFCOURT, ESQ.

Counsel for Tanya Walton

28 <sup>1</sup> I hereby attest that I have on file all the holograph signatures for any signatures indicated  
 by a "conformed" signature (/s/) within this e-filed document.

**ORDER**

FOR GOOD CAUSE SHOWN, IT IS SO FOUND AND ORDERED THAT:

The hearing for change of plea and imposition of judgment and sentence is hereby continued from 10:00 a.m. on March 18, 2008, to April 15, 2008. Time is excluded for purposes of the Speedy Trial Act from March 18, 2008, through the hearing date of April 15, 2008, pursuant to 18 U.S.C. § 3161(h)(1)(I) because that period of delay results from consideration by the Court of a proposed plea agreement entered into by the defendant and the government pursuant to Federal Rule of Criminal Procedure 11(c)(1)(C).

DATED: 3/18/08

  
\_\_\_\_\_  
HONORABLE SAUNDRA BROWN ARMSTRONG  
UNITED STATES DISTRICT JUDGE